Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Deborah O. Raphael, Director
5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

November 18, 2013

Mr. Michael Evans
Associated Plating Co., Inc.
9636 Ann Street
Santa Fe Springs, California 90670

APPROVAL OF RESPONSE TO COMMENTS AND WORKPLAN FOR DEEP VADOSE ZONE INVESTIGATION, ASSOCIATED PLATING COMPANY, 9636 ANN STREET, SANTA FE SPRINGS, LOS ANGELES COUNTY (SITE CODE: 400891)

Dear Mr. Evans:

The Department of Toxic Substances Control (DTSC) reviewed the Response to Comments – DTSC Letter Dated July 2, 2013, Review of Total Petroleum Hydrocarbons (TPH) and Arsenic Data (RTC) and the Work Plan for Deep Vadose Zone Investigation (Workplan) prepared by Worley Parsons, dated September 9, 2013 and received on September 11, 2013. The RTC and Workplan were prepared in response to DTSC comments dated July 2, 2013. The Workplan presents the scope for deep vadose zone soil investigation activities at the Associated Plating Company, Inc. (APC) site (Site).

The 1.25-acre Site consists of an approximately 17,000 square foot plating facility. The plating facility specializes in the use of fused tin and tin/lead alloys using electro and electroless plating. The Site contains two hazardous waste units authorized by the DTSC on August 4, 1993 under Permit by Rule.

On December 31, 1996, pursuant to Health and Safety Code section 25200.14, APC submitted a Phase I Environmental Assessment and Limited Environmental Compliance Assessment to DTSC. On March 9, 2001, DTSC identified five solid waste management units that required further investigation. Based on subsequent investigations in November 2001 and February 2002, DTSC and APC entered into a Corrective Action Consent Agreement on January 5, 2004. The Site was subsequently separated into three operable units (OUs): OU1 consisted of soils above a buried concrete pad at 7 ft bgs; OU2 consisted of soils and the first groundwater zone from 7 to 70 ft bgs; and OU3 consisted of off-site soils and the groundwater zone.

In January 2005, APC submitted a Facilities Investigation Report for OU1 (FI-OU1) documenting soil and soil gas sampling results per a DTSC-approved Facilities Investigation Workplan. On June 28, 2005, DTSC approved the revised FI-OU1 Report and requested a workplan for OU2. On February 27, 2006, DTSC approved the January 2006 revised FI Workplan for OU2. APC submitted an FI Report for OU2 dated June 30, 2006. DTSC approved the FI-OU2 Report on June 27, 2007. During this time, APC submitted a draft Corrective Measures Proposal (CMP) for DTSC review on February 2, 2007. DTSC issued comments on the CMP on April 30, 2007 and September 25, 2009.

DTSC hereby approves the Report provided the attached comments are addressed in future reports/fieldwork. Revisions to the Report are no longer necessary.

If you have any questions regarding the project, please contact Ms. Ivy Osornio, Project Manager, at (714) 484-5433 or me at (714) 484-5368.

Sincerely,

Shahir Haddad, P.E.
Supervising Engineer
Schools Evaluation and Brownfields Cleanup Branch
Brownfields and Environmental Restoration Program

rs/io/sh

Enclosure

cc: (via e-mail)

Mr. Janaka Jayamaha
Project Manager
WorleyParsons

DTSC COMMENTS
RESPONSE TO COMMENTS AND WORKPLAN FOR DEEP VADOSE ZONE INVESTIGATION
ASSOCIATED PLATING COMPANY
SANTA FE SPRINGS, CALIFORNIA

The following DTSC staff reviewed and provided comments herein to the Response to Comments – DTSC Letter Dated July 2, 2013, Review of Total Petroleum Hydrocarbons (TPH) and Arsenic Data (RTC) and the Work Plan for Deep Vadose Zone Investigation (Workplan). Original comments from the DTSC Geological Services Branch (GSB) and Human and Ecological Risk Office (HERO) are available for review in DTSC project files. All questions regarding these comments should be directed to the Project Manager.

CY Jeng, Ph.D.
Staff Toxicologist
Department of Toxic Substances Control
Human and Ecological Risk Office
5796 Corporate Avenue
Cypress, California 90630
(714) 484-5359
cjeng@dtsc.ca.gov

SPECIFIC COMMENTS:

1. RTC, Section 3, Exclusion of Arsenic As a Constituent of Concern, page 5

   HERO does not agree with the statements regarding the arsenic concentration (35 mg/kg) in the sample B-49 being a statistical outlier and thus not warranting further consideration, as a statistical outlier may indicate a localized hot spot in soil and a similar concentration was also reported in another fill sample (33 mg/kg in the 5-ft sample at MW-2). However, the proposed exposure control measures (i.e., maintenance of capped surfaces and safety/administrative requirements for intrusive work) appear adequate to prevent exposure of on-site workers to soil and should be included in the final remedy.

1. RTC, Table 4, Total Petroleum Hydrocarbon Chemical Constants

   While HERO does not endorse the use of CCME-based toxicity values for individual TPH factions on Table 4, the estimated 95% UCL concentrations on Table 2 do not expect to result in significant health hazards for commercial and construction workers, considering that key TPH constituents (e.g., BTEX and naphthalene) have previously been evaluated. Thus, HERO concurs that TPH does not need to be evaluated for direct soil exposures in future health risk assessments. However, HERO supports the GSB comment on the Deep Vadose Zone Investigation Workplan to retain TPH for further evaluation of potential impact to groundwater.

Jose Marcos, P.G.
Engineering Geologist
Department of Toxic Substances Control
Geological Services Unit
5796 Corporate Avenue
Cypress, California 90630
(714) 484-5492
jmarcos@dtsc.ca.gov

COMMENTS:

See attached memo.

Matthew Rodriquez
Secretary for
Environmental Protection

Department of Toxic Substances Control

Deborah O. Raphael, Director
5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

TO: Ivy Osornio
Project Manager
Cleanup Program

FROM: for Jose Marcos, P.G.
Engineering Geologist
Cypress Geological Services Unit

DATE: October 9, 2013

SUBJECT: WORK PLAN FOR DEEP VADOSE ZONE SITE INVESTIGATION
ASSOCIATED PLATING COMPANY, 9636 ANN STREET
SANTA FE SPRINGS, CALIFORNIA
PCA: 22120 Site: 400891-48 WR: 20019788

As requested, the Geological Services Branch (GSB) reviewed the following documents for the Associated Plating facility: "Work Plan for Deep Vadose Zone Site Investigation" and a response to comments letter. The documents were prepared by WorleyParsons for Associated Plating and are both dated September 9, 2013.

Associated Plating operates a plating shop for metallic components on approximately 1.25 acres of land in the City of Santa Fe Springs. Previous subsurface investigations detected significant concentrations of volatile organic compounds (VOCs) and total petroleum hydrocarbons (TPH) in soil, soil gas and groundwater.

Comments

1. Task 2 – The work plan states that soil samples will be collected in acetate sleeves and analyzed using US EPA Method 5035/8260B. Please clarify that US EPA Method 5035 protocols will be used to properly obtain a soil sample for VOC analysis. Describe the field procedures and equipment that will be used in the collection of the Method 5035 sample.

2. Task 2 – In addition to VOCs, GSB recommends that TPH be included as an analyte in the proposed scope of work. According to Table 2 of the TPH and arsenic letter (September 9, 2013) from the facility to DTSC, TPH detections at the site (maximum, mean and the 95% UCL of the mean) exceeded the screening levels for groundwater protection. TPH should be carried forward in future characterization and remedial evaluations at the site.

3. Task 3 – The work plan states that the 2012 DTSC soil vapor advisory will be followed in the collection of soil vapor samples. Please provide additional details regarding the construction of each multi-depth soil vapor probe, include a diagram of the well construction. The proposed default soil vapor sample depths of 10, 15, 25 and 35 feet appear adequate, but should be adjusted accordingly depending on the subsurface soil that is encountered during drilling. The work plan did not describe the requirement for purge volume testing. Please include purge volume testing in the work plan to determine the optimum purge volume for collecting soil vapor samples at the site. To maximize the utility of the field effort, GSB recommends installing permanent/semi-permanent soil vapor wells instead of the proposed temporary wells. These wells can be used in the future to monitor site conditions and progress of remediation.

4. Proposed Sample/Soil Vapor Well Locations – GSB concurs with the proposed sample locations however, in GSB's cursory review of the data, GSB identified the following locations as potential additional target locations for deeper soil sampling, previous borings B8 (URS), B-18 (Komex 2004), B12 (URS) and B-37/B-38 (Komex). These locations showed elevated concentrations of different VOCs in soil/soil gas, in addition to PCE/TCE. Please evaluate the historic data and accessibility issues for these locations, and propose them as additional sample locations if appropriate. GSB recommends evaluating all the historic site data to identify other areas that require deeper soil investigation.

5. Protection of the underlying beneficial use groundwater from vadose zone contamination – The facility should develop vadose zone remedial action goals that are protective of the underlying beneficial use groundwater. These remedial action goals should be considered in the evaluation of remedial alternatives for the site.

6. Groundwater Investigation – Due to the existing groundwater contamination at the site, additional groundwater investigations and regular groundwater monitoring should be performed. A workplan should be prepared describing the proposed investigation to determine the lateral and vertical extent of groundwater contamination and a plan to perform regular groundwater monitoring. The project team should coordinate with the US EPA Omega Superfund project team to have a better understanding of the groundwater conditions in the area and to promote consistency in the remediation of groundwater.

Summary of Recommendations:

The proposed scope of work is generally acceptable provided that the above-comments are addressed adequately. GSB reiterates its previous recommendations related to characterization and remediation of contamination in the deeper vadose zone (which is currently being planned), evaluation and mitigation of the threat to groundwater from existing vadose zone contamination and, characterization and monitoring (and remediation if necessary) of groundwater contamination.

All comments and recommendations made in this document are site-specific and should not be considered as a general policy decision applicable to other sites. If you have any questions, you may contact me at (714) 484-5492 or jose.marcos@dtsc.ca.gov.

Reviewer: Greg Neal, PG

cc: Alfredo Zanoria, C.E.G., C.H.G.